

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
	:	
MARLEASA A. SHERRILL-BRYANT, a/k/a	:	CASE NO: 14-14472ELF
MARLEASA SHERRILL	:	
MARLEASA BRYANT	:	
	:	
	:	
Debtor	:	
	:	
	:	

**DEBTOR'S RESPONSE TO THE MOTION
REQUESTING RELIEF FROM THE AUTOMATIC STAY**

The Debtor, through counsel, responds to the Motion of Bank of America, N.A. (“Movant”)

Requesting Relief from Automatic Stay (the “Motion”) as follows:

1. On December 29, 2017, Debtor informed her counsel that she had cured any postpetition delinquency owed to PHFA and that she would provide confirmation;
2. On January 2, 2018, undersigned counsel asked counsel for PHFA, via email, for confirmation as to whether the cure amount had been received;
3. On January 11, 2018, undersigned counsel again asked PHFA’s counsel for an update;
4. Counsel for PHFA never responded to the request for confirmation.
5. Unfortunately, Debtor has been equally unresponsive to undersigned counsel’s follow-up requests for proof of payment to PHFA.
6. While PHFA has filed a certification of no response to its motion for stay relief, given the representation made by Debtor to her counsel, undersigned counsel asks that the Court hold this matter to give Debtor the opportunity to appear at the hearing scheduled on January 23, 2018.

/s/ Alfonso Madrid
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